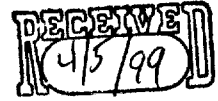




6111 Broken Sound Parkway NW  
Boca Raton, FL 33487-3693  
(561) 241-9400  
Fax (561) 995-5188

March 31, 1999

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Food and Drug Administration  
Office of Special Nutritionals (HFS-450)  
Center for Food Safety and Applied Nutrition  
200 C Street, SW  
Washington, DC 20204

Dear Sirs:

Notice is hereby given pursuant to the requirements of Section 403(r)(6) (21 U.S.C. § 343(r)(6)) of the Federal Food, Drug, and Cosmetic Act and in accordance with the requirements of 21 CFR § 101.93, that Rexall Sundown, Inc. located at 6111 Broken Sound Parkway, N.W., Boca Raton, Florida 33487 has marketed a dietary supplement under the Sundown Herbals brand name bearing the following statement(s) on the label and/or in the labeling:

Grape Seed Extract: For superior antioxidant protection. Free radicals are by-products of energy metabolism that damage cells and DNA. Antioxidants defend and protect our cells from the damaging effects of free radicals. The biologically active flavonoids in Sundown Standardized ActiVin™ Grape Seed Extract have been shown in university studies to provide superior antioxidant protection. For further protection from free radical damage, take this product with Sundown CoQ-10 or Alpha Lipoic Acid. CoQ-10 is essential for the health of all body cells, tissues and organs. Alpha-Lipoic Acid is often referred to as the "super antioxidant" because it enhances the potency of other antioxidants in the body. Grape seed is one of nature's richest sources of antioxidant flavonoids which are potent free radical scavengers.

The undersigned certifies that the information contained in this notice is complete and accurate and that Rexall Sundown, Inc. has substantiation that the statement is truthful and not misleading. Pursuant to § 101.93 (a)(1), two copies of this notification are enclosed.

Sincerely,

*Deborah Shur Trinker*

Deborah Shur Trinker  
Vice President of Regulatory Affairs  
and Assistant General Counsel

Enclosure

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